

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

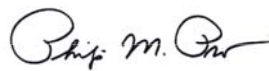
AMBER TROBRIDGE, et al.)	CASE NO: 2:10-cv-01321-PMP -PAL
)	
Plaintiffs,)	
)	
vs.)	JUDGE: Philip M. Pro
)	
LAWRENCE TROBRIDGE, et al)	
)	[Draft-Proposed]
Defendants)	
)	Rule 26 (f) Report
)	SCHEDULING/DISCOVERY PLAN
)	
)	

1. An initial pretrial/discovery conference was not possible because Defendant Larry Trobridge is to be dismissed and Defendant Micro Tool Services, Inc. is a defaulted defendant and not represented.
2. Pursuant to Rule 26(f), Plaintiffs have considered the nature and basis of their claims, the possibilities for a prompt settlement or resolution of the case, and developed a proposed discovery plan. It has not been possible to confer because Defendant Larry Trobridge is likely to be dismissed and Defendant Micro Tool Services, Inc. is a defaulted defendant and not represented.
3. Plaintiffs shall prepare and have available if any person enters the case either to represent Defendant Micro Tool Services, Inc. or on behalf of any of the John Doe Defendants if they are named the preliminary information identified by Rule 26:
4. The issues on which the Plaintiffs need to conduct discovery are:
 - a. The value of Micro Tool Services, Inc. and actions that were taken to reduce or adversely affect its value and the effect of this on the Plaintiffs stock.
 - b. The reasons and how the corporate transactions, which affected plaintiffs or their stock, were done.
 - c. The transactions, which occurred with Micro Tool Service, Inc. who was involved, what was their role.
 - d. The role of others in the transactions with Micro Tool Services, Inc.
 - e. The other facts and transactions alleged in the Complaint.
 - f. Plaintiffs propose discovery, since it shall occur in Dayton, Oh, primarily to be a period of 18 months.
 - g. Identification of experts shall be done by subsequent agreement or order of the Court. Deposition schedules for such witness shall be determined at such time.

5. The parties shall have until January 31, 2013 to move to amend pleadings to add claims or defenses.
6. The parties shall have until January 31, 2013 to file other nondispositive motions. (e.g., consolidation, bifurcation)
7. The parties shall have until September 1, 2012 to file threshold motions (e.g., jurisdiction, qualified immunity, statute of limitations). Discovery shall not be stayed during the pendency of such motions.
8. The parties shall have until June 30, 2013 to file other dispositive motions (summary judgment as to all or part of the case).
9. Each party shall serve no more than 25 interrogatories, including subparts, unless good cause shall be shown. No broad contention interrogatories (i.e., "List all facts supporting your claim that . . .") shall be used.
10. Each side shall take no more than 10 discovery depositions unless good cause shall be shown.
11. Depositions taken for presentation at trial shall be completed 30 days before trial.
12. Alternative Dispute Resolution. Because Micro Tool Services is not represented early dispute resolution is not possible. However, Defendant Larry Trobridge has been moved to be dismissed as his matter was resolved by settlement in Adversary Bankruptcy proceedings.
13. A discovery status conference would not be helpful in this case under the present circumstances.
14. The parties will not voluntarily waive their rights to proceed before a district judge and consent to have a magistrate judge conduct any and all further proceedings in the case, including the trial, and order the entry of a final judgment.
15. Trial of this case will be a jury trial.
16. The estimated length of trial is 3 days.

/s/Joseph D. Carney
Joseph D. Carney (#0010886)
JOSEPH D. CARNEY & ASSOCAITES,
LLC
2001 Crocker Road, Suite 530
Westlake, Ohio 44145
Phone: 440.249.8050
Fax: 866.270.1221
Email: jdc@jdcarney.com
Attorney for Plaintiffs

IT IS SO ORDERED.



PHILIP M. PRO
UNITED STATES DISTRICT JUDGE

Dated: July 9, 2012.